

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

*Plaintiff and Counter Defendant,*

And

JOHN MICHAEL GRZAN AND NAMRATA  
KHIMANI

*Counter Defendant,*

v.

ALAN BRAM GOLDMAN;

*Defendant and Counter Claimant.*

Case No. 3:20-CV-01747 (PAD)

BREACH OF CONTRACT; SPECIFIC  
PERFORMANCE OF CONTRACT;  
REIMBURSEMENT OF FUNDS, COSTS  
AND EXPENSES

**JOINT MOTION INFORMING THE COURT OF THE STATUS OF DISCOVERY**

TO THE HONORABLE COURT:

Pursuant to this Honorable Court's Case Management Order, Docket No. 38, Plaintiff Teal Peak Capital, LLC and Defendant Alan Bram Goldman (both parties referred hereinafter as "the Parties") respectfully submit their Joint Motion Informing the Court of the Status of Discovery as follows:

1. Pending before this Honorable Court is Defendant Alan Bram Goldman's Motion to Dismiss the Amended Complaint. *See* Docket No. 63. Defendant Alan Bram Goldman also filed a Renewed Motion to Stay Discovery and/or Order a Mediation Conference. *See* Docket No. 88.

2. Plaintiff has opposed Defendant's Motion to dismiss and does not agree to any stay of the proceedings. Furthermore, this Court has not granted Defendant's request to stay discovery. Consequently, Plaintiff will serve upon Defendant a First Set of Interrogatories and Requests for Production of Documents no later than the end of this week.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 11<sup>th</sup> day of October 2021.

**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall notify all counsels of record.

*Attorney for Alan Bram Goldman*

**McConnell Valdés LLC**

PO Box 364225

San Juan, Puerto Rico 00936-4225

270 Ave. Muñoz Rivera

Hato Rey, PR 0918

T: 787-250-5604

By: s/ Antonio A. Arias-Larcada

Antonio A. Arias-Larcada, Esq.

USDC-PR 204906

aaa@mcvpr.com

*Attorney for Teal Peak Capital, LLC*

**Sánchez-Betances, Sifre & Muñoz-Noya, LLC**

33 Calle Bolivia, Suite 500

San Juan, Puerto Rico 00917

T: 787-756-7880

F: 787-753-6580

s/ Adrián Sánchez-Pagán

Adrián Sánchez-Pagán

USDCPR NO. 223311

asanchez@sbsmnlaw.com